

Honorable Julius Genachowski, Chairman  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

I have the great fortune of knowing several deaf individuals. I have seen how VRS has improved their lives by allowing them to interact with other people while allowing them to communicate in their native American Sign Language. I have seen first-hand that this life-altering broadband service is a vital link that connects deaf people to the hearing community.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide ?functionally-equivalent? communications. VRS allows deaf people to express their full range of emotions and the true intent of their communications. The interpreters that act as the communication facilitators are especially skilled and trained to provide interpretations that do not skew or misrepresent what is being communicated.

TTY communication does not allow this. When a hearing person that is not familiar with the deaf community is listening to a CA say word-for-word what is being typed across their screen they cannot express whether the caller is angry, depressed, crying, or even happy. VRS calls when compared to TTY relay is smoother. Conversations happen in "real time" and in a natural manner making it much more equivalent to those between hearing people. More and more deaf people have managed to move into new professions and / or be promoted into positions that allow them to earn wage that does not come from some government welfare program. For far too long the deaf community has been limited in all aspects of their life due to the fact that they could not communicate as easily and clearly as hearing people over the telephone.

Bottom line is that with VRS deaf people are much much closer to "functional-equivalency" than they have ever been. Without VRS they will be forced backwards in time. Possibly forced back into public assistance. Possibly have their self esteem and sense of worth crushed. Feel like they do not matter to the rest of the world. Possibly become disconnected.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and

inclusion ? or force deaf users to revert to TTY communications. And, you will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of poverty and isolation.

I was deeply disturbed to see the Commission's recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. This would be disastrous for deaf VRS users.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

Recent reports of fraud in the VRS industry are disturbing to employees working for companies that have operated within current FCC guidelines and has worked to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,

Akiko Fredricks